



D-AFS-K65197-CA
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

970137

EC-2

MAY 29 1987

John Skinner, Tahoe Forest Supervisor
631 Coyote Street
P.O. Box 6003
Nevada City, CA 95959

Dear Mr. Skinner:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **Canyons** project. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

In addition to the "no action" alternative, the DEIS analyzes a preferred alternative which outlines various management actions designed to move the Canyons analysis area toward desired conditions. The Canyons analysis area is currently characterized by dense, even aged stands with high tree mortality. Two sub-watersheds in the analysis area exceed the threshold of concern (TOC). The proposed management actions include thinning, mistletoe sanitation, fuels treatments, reforestation, and road work. Although up to five sub-watersheds could exceed TOC following implementation of the management actions, it is anticipated that implementation of the management actions will improve forest conditions over the long-term.

EPA supports the goal of improving long-term forest health and wildlife habitat, and concurs that the management actions proposed appear to address many of the forest health issues present in the analysis area. EPA is concerned, however, that the proposed changes to the transportation system outlined in the preferred alternative do not go far enough to address impacts to water quality, and in some cases will create new impacts. EPA encourages the Forest Service to use the opportunity provided by the Canyons environmental analysis process to take a hard look at the over-loaded condition of the project area, and take steps to eliminate impacts from unnecessary roads. To that end, EPA encourages the Forest Service to define the scope of roads which provide "essential transportation system benefits" as narrowly as possible, and obliterate roads and trails which do not provide essential system benefits.

EPA is concerned about roads and trails causing resource damage to streams, meadows, and riparian areas. The DEIS outlines resource damage caused by the current road network. At page 3-20, the DEIS states: "Currently, roads in the analysis area exist in meadows, adjacent to meadows, in SMZs, and in riparian areas. These roads are impacting meadow and riparian plant communities directly, indirectly, and cumulatively." At page 3-25 the DEIS states:

"(f)uelwood cutters, hunters, and recreationists . . . generate a great deal of motorized travel both on and off-highway. A large volume of roads and unclassified wheel tracks have resulted from this use. A high rate of resource damage has occurred, primarily in early winter and spring. Impacts to wet meadows and rutting of roads commonly occur.

Forest Road #72 and many of its spur roads were designed and built for previous timber sales. Several unclassified wheel tracks have developed from OHV use over the skid roads and temporary road construction that have resulted from these sales. Many of the wheel tracks and resulting temporary roads cross drainages by dropping straight into and then climbing straight out of them with no improvements to prevent direct runoff down the trail into the draws."

EPA recommends that the FEIS specifically identify all roads and trails causing adverse environmental impacts (in addition to the 7.2 miles marked for obliteration), and include a plan to obliterate such roads and trails.

EPA is also concerned about the proposal to construct approximately 1 mile of road/trail for OHV recreation. Although EPA supports the Forest Service's plan to abandon/obliterate a 1 mile section of OHV road/trail which is negatively impacting a drainage area, we consider the .5 mile "relocated" and "temporary" sections to be "new construction" because these sections would become part of a permanent OHV trail network. In EPA's opinion, construction of new roads/trails in an analysis area currently experiencing road-related impacts is unwarranted. EPA urges the Forest Service to eliminate new road construction from the preferred alternative.

In light of these concerns, EPA has rated this DEIS EC-2 (Environmental Concerns--Insufficient Information) (see attached "Summary of the EPA Rating System"). We appreciate the opportunity to review this DEIS. If you have questions, please call Leonidas Payne of my staff at (415) 744-1571.

Sincerely,



David J. Farrel, Chief
Federal Activities Office

Filename: canyons.dei
MI002834

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."